

STATE OF INDIANA)
)
COUNTY OF MARION)

SS:

BEFORE THE INDIANA ENVIRONMENTAL
MANAGEMENT BOARD

GARY DEVELOPMENT COMPANY, INC.,)
)
Petitioner,)

vs.)

INDIANA ENVIRONMENTAL MANAGEMENT)
BOARD,)
Respondent.)

CAUSE NO. N-146

US EPA RECORDS CENTER REGION 5



436282

RECEIVED

DEC 20 1985

INDIANA ENVIRONMENTAL
MANAGEMENT BOARD

OFFER OF PROOF

Comes now the Petitioner, Gary Development Company, Inc., by counsel, and pursuant to the Hearing Officer's Order of December 2, 1985, sets forth the following specified documents which are attached hereto as additional evidence pursuant to the Order of Remand of the Environmental Management Board. Said documents were officially presented to the Technical Secretary of the Board during the Board hearing on November 15, 1985, with a pleading entitled Verified Petition to Introduce Newly-Discovered Evidence:

1. Twenty-one (21) ISBH inspection reports of Petitioner's site dated between September 27, 1984, and November 6, 1985.
2. Letter of LTV Steel Company to Gary Land Development dated August 20, 1985.
3. Soil boring report of ATEC and Associates dated September 13, 1985, with two pages of attachments.
4. Soil boring report of ATEC and Associates dated November 8, 1985, with four pages of attachments.

The authenticity of the foregoing documents was verified by Larry Hagen, Vice-President of Gary Development Company, Inc. in the Verified Petition of November 15, 1985.

WHEREFORE, Petitioner offers to prove the foregoing described documents and moves for their admission into evidence.

PARR, RICHEY, OBREMSKEY & MORTON

Attorneys for Gary Development
Company, Inc.

By


Warren D. Krebs

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Offer of Proof upon Mathew S. Scherschel, Deputy Attorney General, 219 State House, Indianapolis, Indiana 46204; by U.S. Mail, postage prepaid this 20th day of December, 1985.


Warren D. Krebs

PARR, RICHEY, OBREMSKEY & MORTON
121 Monument Circle
Suite 500
Indianapolis, Indiana 46204
Telephone: (317) 632-3686